Proceeding:	In the Matter o	1998 Biennial	Regulatory Review Amer	ndment of Part of the	Record 1 of 1	
Applicant Name:	Bruce E Richa	rds				
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My comments on 98-143 follow.

par 12 comment:

The novice frequencies could be best utilized by eliminating them and splitting them up both to SSB and CW

Par 13 comment:

Technician Plus operators spend most of there time operating on 10m SSB, and other bands on CW. They do operate on VHF etc., but it is not the majority of there operating. The combining of the Tech and the Tech/Plus into one data base will cause total confusion, and make it a none controlable mess on 10m since they will be listed the same. This happened when the no-code licence was first introduced. A better solution would be as the ARRL proposal suggested, is to merge the Tech/Plus with the General class operators. There is very little difference in there requirements. The main one being CW speed. Many Tech/Plus operators have passed the exact elements as the General, except the code speed.

Par 14 comment:

Concur - Amateurs licenses should be allowed to administer any exam for any class that is a lower level than their own after the proper VE questions are put into the all test elements.

Par 16 comment:

Concur - The RACES license is redundant and not needed.

Par 18 comment:

Possibly enforcement might be improved if the Auxiliary were given the power to send official violation warnings to any amateur for the first violation of willful interference. Then to send "a draft order to show cause" (as suggested in the paragraph) for suspending or canceling the operating license of any amateur licensee when three or more auxiliary members concur that the licensee is guilty of an additional willful interference practice on any amateur band. This "draft order" should be a form prepared by the FCC and samples provided to the observers and explain to the amateur community via the ARRL to eliminate the secrecy aspect and forewarn all amateurs.

Par 23 comment:

Concur - The different code speeds are not really relevant to good or proper operating procedure that many proclaim. There are bad operating practices at all levels as it is the person and their character that determines how they behave.

Par 24

IF we "must" have 3 levels of code proficiency - why not have 5 wpm for General Class; 10 wpm for the Advanced; and 15 wpm for Extra Class. Why does a higher code speed proficiency matter and what does it prove? Is it intended to maintain a Class System? If so, a increased knowledge in technical areas would be more useful as a requirement. Lets maintain a high level of skill in Ham Radio, but put it into more useful areas.

Par 25

While valid in a few cases, the medical disability claim for the code requirement is abused by many to get around the higher code speed test. How many people use this deception by having a friendly MD write a note is difficult to determine and would invade the privacy of many. The only

answer is to allow it or disallow any exception which would not be fair to the truly handicapped. However, I am told there is one quadriplegic who sends code with his chin using an automatic electronic key. There's a real determined ham I would like to meet. If it is allowed, it should be only up to a class that gives basic HF coverage on all bands, a waver to Extra is not desirable, or needed.

Par 26 and 27
Concur - VE Goups should be allowed to changed the questions technical content for relevancy BUT, this should ONLY be done every 4 or 5 years and done through ARRL oversight for nationwide consistency to avoid variances in testing difficulty from area to area.